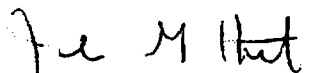


CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1

I, John G. Hutchinson, hereby certify that counsel for defendants made a good faith effort to reach agreement with counsel for the plaintiff on the matters set forth in this motion and the accompanying opening brief in an effort to secure production of the documents and disclosure of the information without court action, but was unable to do so.

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May 31, 2005



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